

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

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CLERK U.S. DIST. COURT
WEST. DIST. OF MO.
KANSAS CITY, MO.

MICHAEL LAMAR ROLF SR

PO Box 411551

KANSAS City, Mo 64141-1551

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

PEPSICO / THE PEPSI Company

ATTN: RAMON L. LAGUARTA

700 ANDERSON HILL RD

PURCHASE, NEW YORK, 10577

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 4:21-cv-524-GAF

(to be filled in by the Clerk's Office)

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury. ☐ Yes ☒ No

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Michael Lamar Rold SR
Street Address Po Box 411551
City and County Kansas City / Jackson
State and Zip Code Missouri / 64141-1551
Telephone Number 816-437-9370
E-mail Address PINKY.ANDTHEBRAIN@HOTMAIL.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name PEPSICO / THE PEPSI COMPANY
Job or Title (if known) ATTENTION: RAMON L. LAQUARTA
CHAIRMAN AND CHIEF EXECUTIVE OFFICER
Street Address 700 ANDERSON HILL RD
City and County PURCHASE / ^{HARRISON} WESTCHESTER COUNTY
State and Zip Code NEW YORK 10577
Telephone Number 1-800-433-2652
E-mail Address (if known) _____

Defendant No. 2

Name _____
Job or Title (if known) _____
Street Address _____
City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____
(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the designated information for this type of case. (Check all that apply)

☒ Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

~~FOIA~~ TITLE 21, Volume 4) FDA Guidelines, Code of Federal Regulations
REVISED AS OF April 1st, 2016

CITE: 21 CFR 201.10) ALSO: LIT > U.S. CODE > TITLE 18
> PART I > CHAPTER 65 > 1365, 18 U.S. CODE 1365 - TAMPERING WITH CONSUMER PRODUCTS. ALSO U.S. PATRIOT ACT

☐ Suit against the Federal Government, a federal official, or a federal agency SEC 802 & 806

List the federal officials or federal agencies involved, if any.

☒ Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

A. The Plaintiff(s)

The plaintiff, (name) MICHAEL L. ROIF SR is a citizen of the State
of (name) MISSOURI.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual
~~PEPSICO / THE PEPSI COMPANY~~ MLR
The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.
2. If the defendant is a corporation
The defendant, (name) ~~PEPSICO / COMPANY~~ THE PEPSI
is incorporated under the laws of the State of (name)
NEW YORK, and has its principal place of
business in the State of (name) NEW YORK. Or is
incorporated under the laws of (foreign nation)
_____, and has its principal place of
business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy---the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake---is more than \$75,000, not counting interest and costs of court, because (explain):

I'm SEEKING RELIEF IN THE AMOUNT OF
\$ 823,000,000.00 EIGHT HUNDRED AND
TWENTY THREE MILLION DOLLARS.

III. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you? I DRANK "2" CANS OF
OF THE ~~PEPSI~~ PURCHASED "3" CANS OF MOUNTAIN DEW
BASA, THAT CONTAINED ILLEGAL CLASS "A"
NARCOTICS AND HAZARDOUS CHEMICALS
- What injuries did you suffer? I FELT HIGH UNDER THE INFLUENCE
HEADACHES, SORE THROAT, ~~CONFUSION~~
- Who was involved in what happened to you?
PEPSICO / THE PEPSI COMPANY / THEIR A NARCOTIC
DOMESTIC TERRORIST
ORGANIZATION.

- How were the defendants involved in what happened to you? THEY MANUFACTURED, DISTRIBUTED, AND HAD THE PRODUCT RETAILED.
- Where did the events you have described take place?
PROSPECT
RESEARCH

XPRESS MART 7033 PROSPECT AVE, KANSAS CITY MO 64132
MEDICAL CENTER 2316 E. MEYER BLVD, KANSAS CITY, MO 64132
 When did the events you have described take place?
7-9-2021

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

I'm SEEKING RELIEF IN THE AMOUNT OF:
\$ 823,000,000.00 EIGHT HUNDRED AND
TWENTY THREE MILLION DOLLARS

Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes ☒ No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒ No ☐

Do you claim punitive monetary damages?

Yes ☒ No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

Actual Damages \$823,000,000.00, For the wrongs committed I
SEEK Punitive Monetary Damages in the amount: \$823,000,000.00

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 19, 2021

Signature of Plaintiff

Michael L. Rolf Sr

Printed Name of Plaintiff

MICHAEL L. ROLF SR